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17 **UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 *In re: Hyundai and Kia Engine*  
20 *Litigation II*

Case No. 8:18-cv-02223-JLS-JDE

**APPLICATION FOR LEAVE TO  
FILE UNDER SEAL PORTIONS OF  
DECLARATION OF BONNER C.  
WALSH IN SUPPORT OF  
PLAINTIFFS' SECOND  
SUPPLEMENTAL BRIEF  
REGARDING OBJECTIONS AND  
SUMMARY OF SETTLEMENT  
ADMINISTRATION**

1 Under Local Rule 79-5.2.2(a), Plaintiffs file this Application for leave to file  
2 under seal portions of the Declaration of Bonner C. Walsh in Support of Plaintiffs'  
3 Second Supplemental Brief Regarding Objections and Summary of Settlement  
4 Administration to avoid educating potential fraudsters on how better to evade detection  
5 in submitting fraudulent settlement claims. Specifically, Plaintiffs seek to file under seal  
6 the entire section entitled "Potentially Fraudulent Claims" and all content in Exhibits A  
7 and C to the Declaration.

8 In accordance with Local Rule 79-5.2.2(a), Plaintiffs' Counsel conferred with  
9 Defendants' counsel about this Application on January 17, 2024, and Defendants do not  
10 oppose filing said portions of the Declaration under seal.

11 In support of this Application, Plaintiffs submit the Declaration of Bonner C.  
12 Walsh, which establishes good cause as to why the material should be sealed and attests  
13 that there is no known opposition to such sealing.

14 **Relief Requested**

15 Plaintiffs respectfully request that the Court grant their Application for leave to  
16 file under seal the above-mentioned portions of the document.

17  
18 DATED: January 17, 2024

Respectfully submitted,

19 /s/ Steve W. Berman

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